



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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[www.epa.gov/region08](http://www.epa.gov/region08)

**FEB - 3 2014**

Ref: EPR-N

Mr. Dennis Rankin  
U.S. Department of Agriculture  
Rural Utilities Service  
1400 Independence Avenue SW, Stop 1571  
Washington, D.C. 20250-1571

Re: Antelope Valley Station to Neset  
Transmission Project Supplemental  
Draft Environmental Impact Statement  
CEQ #20130373

Dear Mr. Rankin:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Antelope Valley Station to Neset Transmission Project Supplemental Draft Environmental Impact Statement (SDEIS) prepared by the U.S. Department of Agriculture Rural Utilities Service (RUS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project, which includes a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

RUS released a DEIS for this project in November 2012. The EPA provided comments on the DEIS in a letter dated January 17, 2013, which is enclosed for reference. The EPA rated the two action alternatives as "Lack of Objections" (LO). Subsequently, the RUS developed new alternatives to add capacity to meet the increase in the electric load forecast for the Bakken region in western North Dakota. The three new action alternatives – Alternatives C, D and E – are within the original project area and follow the same alignment on both east-west segments, but vary in the middle north-south section.

Alternative C combines DEIS Alternative A with portions of DEIS Alternative B. This alternative includes 278 miles of transmission line (265 miles of new 345-kV transmission line and 13 miles of new 230-kV line), four new substations, one new switchyard, but no expansion to four existing substations. What distinguishes Alternative C from the other two action alternatives analyzed in the SDEIS is that there are two separate alignments in the middle section. Alternative D is a modification of DEIS Alternative B. This alternative would include construction of approximately 251 miles of transmission line, including 13 miles of new 230-kV line and 238 miles of new 345 k-V transmission line, of which 63 miles would be 345/345-kV double-circuit. Alternative D would also include construction of four new substations, two switchyards, but no expansion to four existing substations. Alternative E, like D, is

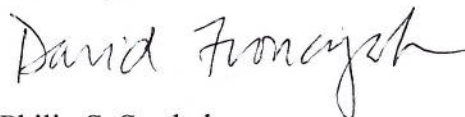
a modification of DEIS Alternative B, but instead of double-circuit 345/345-kV line it would include two parallel 345-kV transmission lines for 63 miles. Alternative E would include construction of approximately 314 miles of transmission line – 13 miles of new 230-kV line and 301 miles of new 345-kV transmission line (126 miles would be two single-circuit 345-kV parallel lines), four new substations, two switchyards, but no expansion to four existing substations.

The EPA appreciates the additional mitigation measures identified in the SDEIS to further protect biological resources, restrict cattle from grazing within the right-of-way until grass is re-established after construction, comply with industry specifications regarding voltage levels and minimize visual contrast at the Little Missouri River crossing.

Because a preferred alternative was not identified in the SDEIS, we are rating each of the three additional action alternatives. Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information presented, the EPA is rating each of the three action alternatives as "Lack of Objections" (LO). A full description of the EPA's rating system can be found at [www.epa.gov/compliance/nepa/comments/ratings.html](http://www.epa.gov/compliance/nepa/comments/ratings.html).

Thank you for the opportunity to provide comments on the Antelope Valley Station to Neset Transmission Project SDEIS. If you have any questions or would like to discuss our comments or rating, please contact me at 303-312-6704 or Carol Anderson of my staff at 303-312-6058.

Sincerely,

*for* 

Philip S. Strobel  
Acting Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

Enclosures:  
EPA Comment Letter on the DEIS







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JAN 17 2013

Ref: EPR/N

Mr. Dennis Rankin  
U.S. Department of Agriculture  
Rural Utilities Service  
1400 Independence Avenue SW, Stop 1571  
Washington, D.C. 20250-1571

Re: Antelope Valley Station to Neset Transmission Project  
Draft Environmental Impact Statement  
CEQ #20120377

Dear Mr. Rankin:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Antelope Valley Station to Neset Transmission Project Draft Environmental Impact Statement (DEIS) prepared by the U.S. Department of Agriculture Rural Utilities Service (RUS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project, which includes a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information present, the EPA is rating the two action alternatives LO (Lack of Objections). Because a preferred alternative was not identified in the DEIS, we are rating the DEIS based on the two action alternatives; we do not rate the no action alternative. A full description of the EPA's rating system is included as an enclosure.

#### PROJECT DESCRIPTION

Basin Electric Power Cooperative (Basin Electric) is proposing to construct, operate and maintain approximately 190 miles of new 345-kilovolt (kV) single pole transmission lines, several miles of 230-kV transmission lines to connect the 345-kV line into the existing system, two new substations – Judson near Williston and Tande near Tioga, a 345-kV switchyard and maintenance access roads. During construction there will be temporary access roads and staging sites. The project is located in portions of Billings, Dunn, McKenzie, Mercer, Mountrail and Williams counties in western North Dakota. Most of the land is privately owned and used for grazing and crop cultivation, interspersed with lands administered by federal agencies. The RUS is the lead federal agency for the EIS and Western Area Power Administration and the U.S. Forest Service are cooperating agencies.

The DEIS states that the purpose of the project is to accommodate the rapid increase in growth in the northwestern North Dakota area as a result of oil development in the Bakken Formation and to ensure that the system complies with North American Reliability Council reliability standards. The short-term load growth in this area is needed to support the rapid expansion in the number of facilities for oil and natural gas production, as well as the supporting infrastructure and services. Power supply studies of the region and upper Midwest have indicated a need for a new 345-kV transmission line to serve the long-term electrical needs of northwestern North Dakota.

Two action alternatives have been developed that follow the same alignment on both east-west segments but diverge in the middle north-south section. The major differences between the two alternatives is that Alternative A traverses 147 acres of the Little Missouri National Grassland, while Alternative B, 56 acres, and only Alternative B includes a 12-acre switchyard.

### General Comments

The EPA submitted a detailed scoping letter for this project dated December 2, 2011. The EPA's review found our scoping recommendations well represented in the DEIS and the RUS has thereby resolved our concerns. The RUS will be preparing a vegetation management plan that addresses the noxious weed potential, and a stormwater pollution plan and hazardous material spill plan to protect water bodies and habitats within, adjacent to or near any of the proposed transmission line alignments. The RUS and the proponent, Basin Electric, have committed to spanning all water bodies to avoid adverse impacts on wetlands, rivers and streams, and to identify and mark wetlands near the construction areas. The best management practices that the RUS proposes to protect air quality during construction are sound. In addition, the EPA appreciates that the discussion of greenhouse gas (GHG) emissions and climate change utilizes carbon dioxide equivalent terms to quantify impacts.

Thank you for your thoughtful consideration of EPA's scoping comments and the opportunity to provide comments on the Antelope Valley Station to Neset Transmission Project DEIS. If you have any questions or would like to discuss our comments or rating, please contact me at 303-312-6925 or Carol Anderson of my staff at 303-312-6058.

Sincerely,



*for*

Suzanne J. Bohan  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

Enclosure:  
EPA's Rating System

